

DAVID CHIU, State Bar #189542
City Attorney
JENNIFER E. CHOI, State Bar #184058
Chief Trial Deputy
HUNTER W. SIMS III, State Bar #266039
Deputy City Attorney
Fox Plaza
1390 Market Street, Sixth Floor
San Francisco, California 94102-5408
Telephone: (415) 554-4259
Facsimile: (415) 554-3837
E-Mail: hunter.sims@sfcityatty.org

Attorneys for Defendants
CITY AND COUNTY OF SAN FRANCISCO;
WILLIAM HUGHEN; KEVIN BIRMINGHAM; NATALIA FOSSI
(ERRONEOUSLY SUED AS NATALIA KWAITKOWSKA);
MAURICIO HERNANDEZ; and JOE DUFFY

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

PATRICK GALLAGHER,

Plaintiff,

vs.

CITY AND COUNTY OF SAN
FRANCISCO, BERNARD CURRAN,
RODRIGO SANTOS, WILLIAM HUGHEN,
KEVIN BIRMINGHAM, NATALIA
KWAITKOWSKA, AND JOE DUFFY,

Defendant.

Case No. 23-cv-03579-SI (JCS)

**JOINT FURTHER CASE MANAGEMENT
STATEMENT**

Hearing Date: August 22, 2025
Time: 3:00 p.m.
Place: Zoom

Trial Date: February 17, 2026

Defendants City and County of San Francisco (the “City”); William Hughen; Kevin
Birmingham; Natalia Fossi (erroneously sued as Natalia Kwaitkowska); Mauricio Hernandez; and Joe
Duffy (collectively, the “Individual Defendants”) (collectively, “the City and the “Individual
Defendants” will be referred to as “Defendants”) and Plaintiff submit this JOINT CASE
MANAGEMENT STATEMENT pursuant to the Standing Order for All Judges of the Northern
District of California (July 1, 2011) and Civil Local Rule 16-9.

FURTHER CASE MANAGEMENT STATEMENT

This case arises out of allegations that Plaintiff was retaliated against by the Individual Defendants for participating a criminal investigation of Defendants Curran and Santos. Defendants Santos and Curran have not yet appeared in this case.

Since the last case management conference on June 13, 2025, fact discovery has been completed. Expert disclosures are due on August 22, 2025. Presently the parties do not anticipate any modifications to the case schedule will be required.

Dated: August 15, 2025

DAVID CHIU
City Attorney
JENNIFER E. CHOI
Chief Trial Deputy
HUNTER W. SIMS III
Deputy City Attorney

By: 

HUNTER W. SIMS III

Attorneys for Defendants
CITY AND COUNTY OF SAN FRANCISCO;
WILLIAM HUGHEN; KEVIN BIRMINGHAM;
NATALIA FOSSI (ERRONEOUSLY SUED AS
NATALIA KWAITKOWSKA); MAURICIO
HERNANDEZ; and JOE DUFFY

Dated: August 14, 2025

By: 

PATRICK GALLAGHER¹

Pro Se

¹ Pursuant to L.R. 5-1(i)(3), the electronic filer has obtained approval from this signatory.

PROOF OF SERVICE

I, KATHLEEN K. HILL, declare as follows:

I am a citizen of the United States, over the age of eighteen years and not a party to the above-entitled action. I am employed at the City Attorney's Office of San Francisco, Fox Plaza Building, 1390 Market Street, Sixth Floor, San Francisco, CA 94102.

On August 15, 2025, I served the following document(s):

JOINT FURTHER CASE MANAGEMENT STATEMENT

on the following persons at the locations specified:

Patrick Gallagher
470 Coletas Way
Byron, CA 94514

Tel: (925) 325-3911
Email: bigblockpat@gmail.com

Plaintiff in Pro Per

in the manner indicated below:

☒ **BY UNITED STATES MAIL:** Following ordinary business practices, I caused to be sealed true and correct copies of the above documents in addressed envelope(s) and had them placed at my workplace for collection and mailing with the United States Postal Service. I am readily familiar with the practices of the San Francisco City Attorney's Office for collecting and processing mail. In the ordinary course of business, the sealed envelope(s) that were placed for collection would be deposited, postage prepaid, with the United States Postal Service that same day.

☒ **BY ELECTRONIC MAIL:** I caused a copy of such document to be transmitted *via* electronic mail in portable document format ("PDF") Adobe Acrobat from the electronic address: kathleen.hill@sfcityatty.org.

I declare under penalty of perjury pursuant to the laws of the State of California that the foregoing is true and correct. Executed August 15, 2025, at California.

/s/ Kathleen K. Hill
KATHLEEN K. HILL